

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN
CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 1:22-cv-02854-JSR

**NOTICE OF MOTION FOR *CY PRES* DISTRIBUTION OF
CLASS ACTION SETTLEMENT FUNDS**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR
ATTORNEYS OF RECORD HEREIN:**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff Yun Wang (“Wang” or “Lead Plaintiff”) and Named Plaintiff Ali Karimi (“Karimi” or “Named Plaintiff” and, with Wang, “Plaintiffs”), will move this Court for entry of the [Proposed] Order Granting *Cy Pres* Distribution of Class Action Settlement Fund (“*Cy Pres* Distribution Order”). Among other things, the *Cy Pres* Distribution Order: (i) approves distribution of remaining Class Action Settlement Funds to a *cy pres* recipient, the Howard University Investor Justice and Education Clinic; and (ii) closes the case.

This motion is based on this Notice of Motion; the Memorandum of Law; the Declaration of Jack Ewashko on Behalf of A.B. Data, Ltd. Concerning the Remaining Funds for *Cy Pres* Distribution; all pleadings and papers filed herein; arguments of counsel; and any other matter properly before the Court.

Plaintiffs respectfully request that the Court decide the Motion on the papers and enter the
Cy Pres Distribution Order.

Dated: January 10, 2025

Respectfully submitted,

POMERANTZ LLP

/s/ Brian Calandra

Jeremy A. Lieberman

Brian Calandra

600 Third Avenue, Floor 20

New York, NY 10016

Phone: 212-661-1100

Fax: 917-463-1044

jalieberman@pomlaw.com

bcalandra@pomlaw.com

*Lead Counsel for Lead Plaintiff Yun Wang,
Named Plaintiff Ali Karimi, and
the Settlement Class*

**BRONSTEIN, GEWIRTZ &
GROSSMAN, LLC**

Peretz Bronstein

60 East 42nd Street, Suite 4600

New York, New York 10165

Telephone: (212) 697-6484

Facsimile: (212) 697-7296

Email: peretz@bgandg.com

*Additional Counsel for Plaintiffs and for the
Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Brian Calandra
Brian Calandra